

Message

From: Tuori, Thomas [ttuori@hselaw.com]
Sent: 11/13/2017 3:22:42 PM
To: Daly, Eric [Daly.Eric@epa.gov]; Ludmer, Margo [ludmer.margo@epa.gov]
Subject: Documentation re: Niagara Falls Boulevard Site [HSELAW-WORKSITE.FID715352]
Attachments: NFB Gamma Survey Map 04-27-2017.PDF

Hi Eric and Margo,

I hope you have both been well.

As you may have heard, we initiated our litigation in October. We are representing 28 plaintiffs who own and/or operate/occupy 32 separate parcels. Our plaintiffs include the owners/operators of all of the impacted parcels at the Niagara Falls Boulevard Site (other than the church); Mr. Raymond, Mr. Wade, and Mr. & Mrs. Michaels on Robert St.; Talarico Bros. Building Corp., Mr. Grace, and the Lozinas (who own/occupy 728 Upper Mountain Road).

In the process of reviewing EPA information about our plaintiffs' properties, I realized that we have very little information and documentation from the EPA's recent work at the Niagara Falls Boulevard properties. Other than the gamma survey data summarized on the attached map, we don't have any results or other documentation from work done in 2015, 2016 or 2017. For example, we have no results from indoor gamma surveys, outdoor sampling of soil/slag, radon sampling or any indoor sub-slab sampling of soil/slag (if conducted).

Are you available for a quick call to discuss this issue? I am generally available this week other than Friday.

Thank you,
Tom



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